IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND Northern Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. WDQ-13-0192
)	(Magistrate Judge Gesner)
RODNEY ELLIS,)	
)	
Defendant.)	
)	

MOTION FOR RELEASE FROM CUSTODY

Defendant Rodney Ellis, by and through undersigned counsel, respectfully moves this Court to permit his release on Electronic Monitoring to permit his self-surrender to the Bureau of Prisons following his sentencing on June 17, 2014. Mr. Ellis has been detained at Chesapeake Detention Facility for more than one year since his initial appearance on April 9, 2013. This Honorable Court signed an Order of Detention on May 20, 2013 (Document 39) citing nature of offense (armed robbery) as the first reason for detention. On April 3, 2014, Mr. Ellis pled guilty to a one count superseding information - conspiracy to possess with the intent to distribute 500 grams or more of cocaine. Mr. Ellis is in Criminal History Category II.

Assistant United States Attorney Clinton Fuchs opposes this motion.

Respectfully submitted,

Pat Munroe Woodward, Esq., No. 16620

1783 Forest Drive, No. 330 Annapolis, MD 21401

Phone: 202-246-4679 Fax: 443-926-9349

patmwoodwardjr@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of April, 2014, I electronically filed the foregoing Motion with the Clerk of Court using the CM / ECF system, which will send an electronic notification of such filing to all counsel of record.

/s/
Pat Munroe Woodward, Esq.